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August 1, 2018

Honorable Michael A. Shipp, U.S.D.J.  
United States District Court for the District of New Jersey  
Clarkson S. Fisher Federal Bld. & U.S. Courthouse  
402 E. State Street, Room 7000  
Trenton, NJ 08608

**Re: *Atlas Systems, Inc. v. Reddy, et al.***  
**Case No. 3:16-cv-05381 (MAS)(TJB)**

Dear Judge Shipp:

The undersigned represents Plaintiffs Atlas Systems, Inc., and Atlas Hana LLC (collectively, “Atlas Systems”) in this matter. As previously noted, Atlas Systems reached a settlement agreement with Defendants Anji Reddy and Vision Soft Consulting, Inc. on September 11, 2017. Pursuant to the terms of the previously reached settlement agreement, the defendant was to have already paid my client the total sum of \$100,000. For months the defendant sought ways to add delay in this matter to avoid his prior promise to make restitution to Atlas Systems. The defendant’s most recent and untimely submission attempting to re-argue the same matter over again is further evidence of his bad faith and delay tactics. Given this untimely submission, Atlas Systems, respectfully requests that the late submission not be considered. In the event, the untimely submission is to be considered, the defendant offers no new arguments and fails to refute the clear findings and terms of the settlement that was previously placed on the record.

For the reasons set forth in Magistrate Bongiovanni’s Report and Recommendations, the recommendation that Plaintiffs’ Motion to Enforce the Settlement of September 11, 2017 and for sanctions against the Defendant should be granted, including an award of counsel fees which will be submitted in the event the recommendations are accepted and a final order is issued in the matter.

Respectfully submitted,

/S/

Joseph C. Tauriello, Esq.

C: Client